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March 12, 2024

Via Electronic Filing

Hon. Zahid N. Quraishi
United States District Court
Clarkson S. Fisher Building
402 East State Street
Trenton, New Jersey 08608

Re: Andy Kim, et al. v. Hanlon, et al.
Docket No. 3:24-cv-01098-ZNQ-TJB

Dear Judge Quraishi:

This office represents Proposed Intervenor Camden County Democratic Committee ("CCDC") in the above matter. CCDC seeks leave pursuant to L.Civ.R. 37.1(b)(3) to submit the attached reply brief in further support of CCDC's Motion to Intervene.

CCDC is seeking leave to file a reply brief because Plaintiffs make contentions in their opposition that misconstrue the arguments of CCDC, particularly that CCDC has conceded that there exist certain advantages from the weight of the line, bracketing, and primacy, and that CCDC should be judicially estopped from advancing its position as set forth in its Brief in Support of Motion to Intervene. Plaintiffs further assert that the interests of CCDC regarding "whether the state may confer ballot advantages beyond endorsements or slogans" are adequately represented by the parties in this litigation. However, CCDC's interest in this action concern its right to associate with Democratic candidates in New Jersey's elections, not the interest as articulated by Plaintiffs. CCDC believes a reply brief, addressing these issues more fully will be useful to the Court in determining whether intervention should be granted.

BROWN & CONNERY, LLP

For the reasons outlined above, we respectfully request leave to submit the enclosed reply brief in further support of Intervenor CCDC's Motion to Intervene.

Respectfully submitted,
BROWN & CONNERY, LLP

s/ William M. Tambussi
William M. Tambussi

cc: All Counsel of Record (*via ECF*)